

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

U.S. DISTRICT COURT  
DISTRICT OF N.H.  
FILED

2015 MAR -6 P 12: 57

Douglas Bersaw  
Plaintiff

Hon. Joseph N. Laplante

v.

Civil Case No. 14-cv-128-JL

Northland Group Inc.  
Defendant

**PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

NOW COMES the Plaintiff, Douglas Bersaw *pro se*, to submit to this Court the Plaintiff's Motion for Summary Judgment today, March 6, 2015.

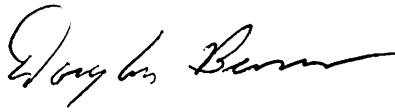
Plaintiff agrees that there exist no material facts any longer in dispute in this case that would prevent a Summary Judgment at this point in the proceedings. For the reasons adduced in Plaintiff's Reply to the Defendant's Motion for Summary Judgment and in the accompanying Brief in Support of this motion Plaintiff hereby begs for judgment from this court.

WHEREFORE, for the reasons set forth above and in the accompanying Brief, Plaintiff, Douglas Bersaw, respectfully requests this Honorable Court to:

- A. Grant its Motion for Summary Judgment;
- B. Enter Judgment for Plaintiff on all remaining claims and close the case; and
- C. Grant such other relief as may be just and proper.

Plaintiff's Objection to MSJ

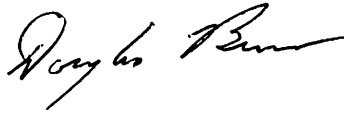
Douglas Bersaw – Plaintiff *pro-se*



**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on the defendant's counsel of record listed below via delivery in hand on this the 6<sup>th</sup> day of March 2015.

/s/ Douglas Bersaw



Plaintiff *pro-se*  
139 Tully Brook Road  
Richmond, NH 03470  
603-239-8827  
thebersaws@ihmmedia.net

Kenneth E. Rubinstein, NH Bar #14926  
krubinstein@preti.com  
Daniel R. Sonneborn, NH Bar #20947  
dsonneborn@preti.com  
P.O. Box 1318  
Concord, NH 03302-1318

Plaintiff's Objection to MSJ